

**UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

EDDIE J. HAYNES,)	
)	
PLAINTIFF,)	
)	
vs.)	CASE NO. 2:06-cv-1093-WKW
)	
CITY OF MONTGOMERY, ALABAMA,)	
)	
DEFENDANT.)	

**SUPPLEMENT TO PLAINTIFF'S MOTION FOR ATTORNEY'S
FEES AND EXPENSES**

Comes now the Plaintiff, Eddie J. Haynes, and supplements his Motion for Attorney's Fees and Expenses by submitting the additional time reflected on the itemization attached hereto as Exhibit A, reflecting additional services rendered by counsel for the Plaintiff in this action since Plaintiff's original Motion. As reflected on Exhibit A, Plaintiff's counsel has reasonably and necessarily spent an additional 34.4 hours since the original motion, and claims an additional \$8,300, making the total amount now claimed \$108,922.07(\$102,345.00 for attorney's fees and \$6,577.07 for expenses).

/s/ Gerald L. Miller
GERALD L. MILLER (MIL039)
/s/ Keith E. Brashier
KEITH E. BRASHIER (BRA113)
Attorneys for Plaintiff

OF COUNSEL:

REDDEN, MILLS & CLARK, LLP
505 North 20th Street
940 Financial Center
Birmingham, Alabama 35203
(205) 322-0457

CERTIFICATE OF SERVICE

I hereby certify that on the 6th day of June, 2008, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Allison H. Highley
Kimberly O. Fehl
Assistant City Attorneys
City of Montgomery
P.O. Box 1111
Montgomery, Alabama 36101-1111

/s/ Gerald L. Miller
OF COUNSEL

REDDEN, MILLER & DARR, LLP
 505 - 20th Street North
 Suite 940 The Financial Center
 Birmingham, AL 35203-2605

June 06, 2008

Eddie Haynes
 AL

In Reference To: Eddie Haynes v. City of Montgomery
 Fire Department
 GLM
 Professional Services

			<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
4/22/2008	GLM	Telephone conference with Mr. Haynes re: status of reinstatement and equitable relief.	\$250.00/hr	0.20	\$50.00
5/9/2008	GLM	Study of post-trial motions (JMOL, New Trial) and responses to motions for attorney's fees and equitable relief filed by City.	\$250.00/hr	1.00	\$250.00
5/12/2008	GLM	Telephone conference with Mr. Haynes re: motions and responses filed by City	\$250.00/hr	0.20	\$50.00
5/13/2008	GLM	Review of Defendant's Memorandum Brief on Motions for JMOL and New Trial and research on issues raised	\$250.00/hr	4.00	\$1,000.00
5/19/2008	GLM	Telephone conference with Mr. Haynes re: progress of case	\$250.00/hr	0.20	\$50.00
	GLM	Research for Memorandum Brief in Response to Defendant's Post-trial motions.	\$250.00/hr	6.00	\$1,500.00
5/20/2008	GLM	Research and preparation of Reply to Defendant's Post-trial motions	\$250.00/hr	4.00	\$1,000.00
5/21/2008	GLM	Research and preparation of responses to Defendant's Post-trial motions.	\$250.00/hr	5.00	\$1,250.00
5/22/2008	GLM	Preparation of responses to Defendant's post-trial motions	\$250.00/hr	3.30	\$825.00
5/23/2008	KB	Conference w/Mr. Miller and research case law	\$175.00/hr	4.00	\$700.00
	GLM	Research and preparation, including revision of response to post-trial motions	\$250.00/hr	6.50	\$1,625.00
For professional services rendered				<u>34.40</u>	<u>\$8,300.00</u>

